C3

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WAU0003 03	10 11 09	=	R	3

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 1 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Summit Farms
Formerly Ro-Dar Farms
6343 Church Road
Ferndale, WA 98284

Entry Time/Date	Permit Effective Date
9:00 AM 11/09/10	NA
Exit Time/Date	**Permit Expiration Date**
9:40 AM 11/09/10	NA

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Rod Erickson - Owner
Kent Erickson - Operator (b) (6) [redacted] cell

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC=0241
Dairy Operation

Name, Address of Responsible Official/Title/Phone and Fax Number

Kent and Rod Erickson
6343 Church Road
Ferndale, WA 98284
(b) (6) [redacted] cell

Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☐ Storm Water	
☑ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

RECEIVED
NOV 29 2010
U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Steven Potokar	EPA OCE- NPDES 206 553 6354	11/10/10
Derek Schruhl	EPA OCE- NPDES 206 553 1146	11/10/2010
Steven Hulbert	WSDA	
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Kimberly A Ogle	EPA OCE NCU 3-0955	11/29/10

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

PCS: 11-30-2010 J. Brown

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit
B	Compliance Biomonitoring
C	Compliance Evaluation (non-sampling)
D	Diagnostic
F	Pretreatment (Follow-up)
G	Pretreatment (Audit)
I	Industrial User (IU) Inspection
J	Complaints
M	Multimedia
N	Spill
O	Compliance Evaluation (Oversight)
P	Pretreatment Compliance Inspection
R	Reconnaissance
S	Compliance Sampling
U	IU Inspection with Pretreatment Audit
X	Toxics Inspection
Z	Sludge - Biosolids
#	Combined Sewer Overflow-Sampling
$	Combined Sewer Overflow-Non-Sampling
+	Sanitary Sewer Overflow-Sampling
&	Sanitary Sewer Overflow-Non-Sampling
\	CAFO-Sampling
=	CAFO-Non-Sampling
2	IU Sampling Inspection
3	IU Non-Sampling Inspection
4	IU Toxics Inspection
5	IU Sampling Inspection with Pretreatment
6	IU Non-Sampling Inspection with Pretreatment
7	IU Toxics with Pretreatment
!	Pretreatment Compliance (Oversight)
@	Follow-up (enforcement)
{	Storm Water-Construction-Sampling
}	Storm Water-Construction-Non-Sampling
:	Storm Water-Non-Construction-Sampling
~	Storm Water-Non-Construction-Non-Sampling
<	Storm Water-MS4-Sampling
-	Storm Water-MS4-Non-Sampling
>	Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A —	State (Contractor)
B ----	EPA (Contractor)
E —	Corps of Engineers
J —	Joint EPA/State Inspectors—EPA Lead
L ----	Local Health Department (State)
N —	NEIC Inspectors
O—	Other Inspectors, Federal/EPA (Specify in Remarks columns)
P—	Other Inspectors, State (Specify in Remarks columns)
R —	EPA Regional Inspector
S —	State Inspector
T —	Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES
Inspection Report

Summit Farms

Ferndale, Washington

November 2010

Prepared by:
Derek Schruhl, Environmental Scientist
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
NPDES Compliance Unit

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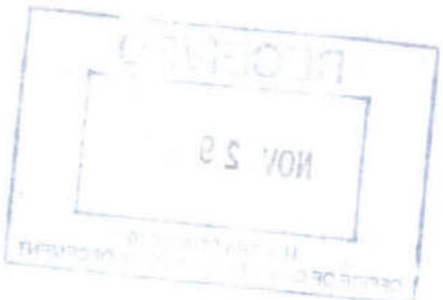

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Rod Erickson or from observations during the inspection.)

I. Facility Information

Facility Name:	Summit Farms (fka Ro-Dar Farms)
Facility Type:	Dairy
Facility Address:	6343 Church Road Ferndale WA 98248
Facility Phone #s:	(b) (6) (Kent Erickson) (Home) (b) (6) (Kent Erickson) (Cell)
Owner/Operator(s):	Kent Erickson (Manager/Operator) Rod Erickson (Owner)
Permit Number:	This facility is not operating under an NPDES permit.
GPS Location:	Lat: N 48.87173, degrees Long: W 122.62203 degrees

II. Inspection Information

Inspection Date:	November 09, 2010
Arrival Time:	9:00 AM
Departure Time:	9:40 AM
Weather:	cloudy, light precipitation, light breeze.
Purpose:	Determination of compliance with the Clean Water Act

III. Background and Activity

This is a dairy that has been family owned for about 100 years. Current owner Rod Erickson has operated the facility for the past 50 years (b) (6) The current lagoon was built in the '90s and updated roughly 5 years ago.

The waste generated at this facility is mainly from the areas where animals are confined. This waste includes manure and urine deposited in the confinement areas.

Waste handling at this facility consists of one underground storage tank for manure and wastewater collection and one lagoon for manure and wastewater collection storage.

Waste from the pens is processed through a separator where the solids are hauled off-site and the liquid is land applied.

The inspection of this dairy is part of EPA Region 10's concentrated animal feeding operation initiative.

IV. Individuals Present

The inspectors present for this inspection were Steven Potokar (EPA), Derek Schruhl (EPA) and Steven Hulbert (Washington State Department of Agriculture).

The facility representative present during the inspection was Rod Erickson.

V. Inspection Entry

We arrived at the facility at 09:00 AM on November 09, 2010 where we met Rod Erickson. We presented our credentials upon arriving and explained the purpose of our visit.

Mr. Erickson did not deny us access to the facility. He accompanied us throughout the inspection.

VI. Inspection Chronology

We began the inspection with a brief opening conference in the parking lot area of the facility. During the opening conference, Steven Potokar explained the purpose of the visit.

After the opening conference, we proceeded to conduct a tour of the facility. The facility tour included an inspection of the pens and waste lagoon.

We concluded the inspection with a brief exit interview where we discussed areas of concern identified during the inspection.

VII. Number of Animals

Mr. Erickson indicated that the facility currently houses 240 dairy cows and approximately 12 dry cows on site.

VIII. Presence of Vegetation in the Confinement Areas

Based on Steven Potokar's observation of the facility at the time of the inspection, the confinement pens were devoid of vegetation.

IX. Length of Animal Confinement

According to Mr. Erickson, the dairy cows at this facility are confined year round in the barns. There is an outdoor pen for dry cows to exercise. The bedding in the barns at the facility is comprised of sawdust.

X. Waste Management Process

The bulk of the waste generated at this facility is in the area where the animals are confined. All waste is scraped, twice a day, into an 8ft by 26ft below ground storage tank where it is then pumped to a waste separator. The solids are taken by third parties. The liquid waste is pumped via underground piping to a waste lagoon where it is stored until land applied.

According to Mr. Erickson, the facility has a total of 200 acres they could apply to and has 6 inch out/12 inch back irrigation lines for land application. The waste lagoon has a 7-8 month, 4-5 million gallon capacity and was built to NRCS standards. There was a discharge from the lagoon 5-10 years ago due to a failure of the lagoon wall during the installation of piping. The lagoon is unlined but has natural blue clay underlying it.

The facility had an NMP, it may need to be updated. Mortalities are picked up by a third party as needed.

See attachment A for facility overview.

XI. Observed Discharge

At the time of this inspection, Steven Potokar saw no discharge to nearby waterways.

XII. Areas of Concern

We inspected the facility including the confinement areas and the waste handling system. Observations during the inspection included the identification of one area of concern.

A. Vegetation around Waste Lagoon

At the time of inspection, we observed vegetative overgrowth around the lagoon, mainly blackberries. Steven Hulbert of WSDA, had previously brought this concern to the attention of Rod Erickson during a recent waste lagoon inspection. Mr. Erickson said that he was in the process of working to clear the vegetation. See attachment B photographs 1-2 for more detail.

XIII. Receiving Water

Mr. Erickson was unsure of the specific names of the nearby waterways but said that he was aware of at least three watersheds that his farm lies within. These watersheds include Nooksack, Terrell Creek, and Drayton Harbor. Drayton Harbor watershed received discharge from the lagoon failure several years ago. There were ditches on the road side, but no significant navigable water in the area.

XIV. Sample Collection and Analyses

No samples were taken during this inspection.

Report Completion Date: Nov. 16, 2010

Lead Inspector Signature: [signature]

Derek Schulz

ATTACHMENT A

Facility Sketch
Summit Farms
(November 09, 2010 Inspection)


Production area
Lagoon
A
Church Rd
Church Rd
Church Rd
TNT Signs & Design
Nicholas Rd
500 ft
100 m
©2010 Google - Imagery ©2010 DigitalGlobe, GeoEye, Cnes/Spot Image, USDA Farm Service Agency, Map data ©2010
Report a problem

ATTACHMENT B

Photograph Documentation
Summit Farms
(November 09, 2010 Inspection)

All Photographs taken by Derek Schruhl on November 09, 2010.

Photograph 1: Easterly view of confinement area and the opening of the underground waste tank.

Photograph 2: Southerly view of waste separator.

Photograph 3: SW view lagoon.

Photograph 4: Another view of lagoon.

Photograph 5: Another view of lagoon.

Photograph 6: View of piping from waste separator into lagoon.